## IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

In re:	$\mathbb{S}$	Chapter 11
KRISJENN RANCH, LLC	S	
Debtor	S	Case No. 20-50805
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KRISJENN RANCH, LLC and	S	
KRISJENN RANCH, LLC-SERIES	S	
UVALDE RANCH, and KRISJENN	S	
RANCH, LLC-SERIES PIPELINE	S	
ROW as successors in interest to	Š	
BLACKDUCK PROPERTIES, LLC,	Š	
Plaintiffs ,	Š	
	Š	
V.	8	
•	8	
DMA PROPERTIES, INC., and	8	
LONGBRANCH ENERGY, LP,		Adversary No. 20-05027
Defendants	S	120,01002, 110, 20 0002.
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DMA PROPERTIES, INC	S	
Cross-Plaintiff/Third Party Plaintiff		
,,,,	8	
V.	8	
	8	
KRISJENN RANCH, LLC,	8	
KRISJENN RANCH, LLC-SERIES	8	
UVALDE RANCH, and KRISJENN	8	
RANCH, LLC-SERIES PIPELINE ROW,		Adversary No. 20-05027
BLACK DUCK PROPERTIES, LLC,	Š	,
LARRY WRIGHT, and JOHN TERRILL	Š	
Cross-Defendants/Third-Party	8	
Defendants	8	
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AGREED JOINT MOTION TO EXTEND DEADLINES FOR THIRD-PARTY DEFENDANT LARRY WRIGHT'S RESPONSE TO THIRD-PARTY PLAINTIFFS DMA PROPERTIES, INC. AND FRANK DANIEL MOORE'S PARTIAL MOTION FOR SUMMARY JUDGMENT

TO THE HONORABLE CHIEF BANKRUPTCY JUDGE RONALD B. KING:

COMES NOW Third-Party Defendant Larry Wright ("Wright") and Third-Party Plaintiffs

DMA Properties, Inc. and Frank Daniel Moore (together, "Moore") in agreement to move

the Court to extend Wright's response date to Moore's Motion for Partial Summary Judgment

filed on July 24, 2020, Doc. #28 in the adversary proceeding, as follows:

1. On August 5, 2020 Wright and Moore filed a stipulation regarding Wright's

answer deadline with the agreed service date being July 24, 2020 and an agreed answer date of

August 14, 2020.

2. Pending before the Court, and prior to Wright's appearance and answer date of

August 14, 2020, Moore filed a Motion for Partial Summary Judgment seeking to construe

language in the Pipeline Easement Agreement which is set for hearing on August 17, 2020.1

3. Due to the stipulation on Wright's answer date of August 14, 2020, the parties

hereby move the Court to reset the MSJ hearing to a date in mid-September and extend

Wright's response to Moore's Motion for Partial Summary Judgment to August 28, 2020.

WHEREFORE, PREMISES CONSIDERED, Wright and Moore pray the Court

grant this Agreed Motion to extend Wright's deadline to respond to Moore's Motion for

Partial Summary Judgment until August 28, 2020, and for the Court to move the hearing date

from August 17, 2020 to a date in mid-September.

Respectfully submitted,

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<sup>1</sup> There are other matters currently set for final hearing August 17, 2020 that are not being re-set

pursuant to this agreement.

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By: <u>/s/ William P. Germany</u>
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By: <u>/s/ Natalie F. Wilson</u>
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DMA Properties, Inc. and Frank Daniel Moore

## Certificate of Service

I hereby certify that on August 10, 2020 a true and correct copy of the foregoing document was transmitted to each of the parties via the Court's electronic transmission facilities and/or via electronic mail as noted below. For those parties not registered to receive electronic service, a true and correct copy of the foregoing document was served by United States mail, first class, postage prepaid, at the address noted below.

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<u>/s/ William P. Germany</u> WILLIAM P. GERMANY